

California AFCARS Assessment Review Report

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**Prepared by:
Children's Bureau, Administration on Children, Youth and Families
and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

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Executive Summary

From June 7 – 10, 2004 staff of the Children’s Bureau, Administration for Children and Families (ACF) Region IX, and the Office of Information Services (OIS) conducted an assessment review of California’s Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS data used for the review was from the report period April 1, 2003 through September 30, 2003 (2003B).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale. A summary of the significant findings is included in the report, and detailed findings can be found in the “Detailed Findings” matrices for the foster care and adoption data elements, and the general requirements (Tab A). The minimum tasks that are required to correct the State’s reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	2
Technical Standards	2

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	6 (9%)	15 (41%)	21 (20%)
3	21 (32%)	3 (8%)	24 (23%)
2	38 (58%)	18 (49%)	56 (54%)
1	1 (2%)	1 (3%)	2 (2%)

Outlined below is an overview of the results of the AFCARS Assessment Review based on the on-site and post-site visit analyses.

General Requirements

The standards for the adoption population require that the State submit all adoptions that it has involvement with either due to the child being in its foster care system and/or one in which there is an adoption agreement. The State has adoption agreements with, and provides subsidies to families that adopted a special needs child through a private agency. The State is not including these adoptions in AFCARS, and must begin doing so immediately.

In regard to the foster care population, the State/counties must ensure that case workers enter situations in which a child is placed back into his/her own home while the agency still has responsibility for care, placement, or supervision. Case workers must not enter these situations as a discharge from foster care; they should enter it as a placement change. If there is a specified period of time that the court has ordered the child home, the State is to continue reporting this child in AFCARS and the placement setting should be “trial home visit.” When a child is returned home for a non-specified period of time, if the timeframe extends beyond six-months, for AFCARS purposes the child would then be discharged from care.

In regard to the technical requirements, the State’s program code does not extract the AFCARS foster care file based on a transaction date associated with either the date of the current removal from home or a discharge from foster care; instead, the extraction is based on whether the child is in an out-of-home placement setting. This results in fluctuations in the number of children being reported in AFCARS each report period by improperly excluding children returned home but for whom the agency continues to have responsibility for supervising. The State must immediately begin using the transaction dates to extract the data files.

Data Elements

As noted in the above chart, there are two elements that the State is not collecting and reporting. One is the foster care element (#62) pertaining to whether child support is a source of income for the child and the other is the adoption element (#34) pertaining to who placed the child for adoption. In regard to the child support element, the State’s information system, CWS/CMS, does not record child support as an asset for the child. The State must develop a method to collect and report whether child support payments are paid on behalf of the child during each AFCARS report period.

The issue with the adoption element on who placed a child for adoption (#34) is related to the adoption population noted above. The State is not including non-State agency adoptions. Currently, the program code sets all responses to “public agency.” This needs to be corrected and CWS/CMS will need to be modified to allow the entry of these children in the adoption file.

System corrections are mainly grouped into two categories, corrections/modifications to the screens and/or changes to the program code that extracts the data from the system. Some screen changes involve adding a field that will more accurately collect the AFCARS data or adding another response. An example of adding a field is the one related to the collection of whether or not a child “has been diagnosed with disabilities.” This is not a question on the CWS/CMS screen; instead the information is derived based on whether diagnosed disability information was entered. If a disability is checked, the response to the question is “yes.” Otherwise, the response is coded as “no,” thereby creating a false “no” in the reported data. This method makes it hard to ascertain if the worker failed to enter the data or, alternatively, if the child had been seen by a physician and did not have any disabilities.

Another issue with the screen design is there are some fields that “pre-fill” with a valid response instead of requiring the worker to answer the question. An example is the question about whether a child has been previously adopted. The screen pre-fills with the response “unable to

determine.” The screens must be modified to not allow pre-filling of information on certain fields.

One type of error in the extraction code is the use of “defaults.” A default means that if there are missing data, the program code extracts a valid AFCARS value. This masks underlying data entry issues and provides an inaccurate reflection of the State’s foster care and adoption population. In other instances, the State staff will need to add to or modify the existing program code to correctly extract the data.

The State/counties also need to address the timely entry of data and oversight of the accuracy of the data. Additional training, supervisory oversight, and use of internal reports are necessary to ensure that the data submitted to ACF and used for national reports accurately reflect the practices in California.

The State needs to assess the ongoing quality of the data. Several items were given the rating of “3” because of underreporting of information and will necessitate additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider reviewing the data in the file at the time of a periodic review to ensure it is accurate and up-to-date. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State’s semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data, and assess its validity prior to submitting it to ACF. To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff are to submit the Improvement Plan to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. Test cases will be provided to the State once all of the required modifications are completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the State agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the State from the Children’s Bureau confirming this fact. The letter will include a summary of the actions taken by the State and the completed AFCARS Improvement Plan.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review (AAR) process was developed. The State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data are also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State's AFCARS.

RATING FACTOR	DEFINITION
1	<p>The AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the data.
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information.
3	<p>The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.</p> <ul style="list-style-type: none"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry.
4	<p>All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 1 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a "2" to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a "3" will be assigned to the requirement. A rating factor of "4" (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a "2" will be assigned. If it appears the problem is due to data entry, then a "3" will be assigned to the requirement.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor, because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the State's AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review was from the report period April 1, 2003 through September 30, 2003 (2003B).

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, and team member notes are assessed to make the final determination of findings. As a result, the draft rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

General Requirements

Population Standards

The most significant problem with the State's reporting population is that the State is not including children placed for adoption through a private agency. The standards for the adoption population require that the State submit all adoptions that it has involvement with either due to the child being in its foster care system and/or one in which there is an adoption agreement. The State has adoption agreements with, and provides subsidies to families that adopted a special needs child through a private agency. The State is not including these adoptions in AFCARS, and must begin doing so immediately.

In regard to the foster care population, the State's program code will extract "trial home visits." The State/counties must ensure that case workers enter situations in which a child is placed back into his/her own home while the county agency still has responsibility for care, placement, or supervision. During the site visit concern was raised that these children are not being included in the State's reporting population. Case workers must not enter these situations as a discharge from foster care; they should enter it as a placement change. If there is a specified period of time that the court has ordered the child home, the State is to continue reporting this child in AFCARS and the placement setting should be "trial home visit." When a child is returned home for a non-specified period of time, if the timeframe extends beyond six months, for AFCARS purposes the child would then be discharged from care.

Technical Requirements

The State was not using the transaction dates associated with the date of removal and the date of discharge to extract the data file. This results in fluctuations in the number of children being reported in AFCARS each report period.

Data Elements

- Lack of system capacity to report certain data elements

At the time of the site visit, the State's information system, CWS/CMS, did not capture the following data elements:

- Title IV-D (Child Support) (foster care element #62) as a source of income;
- Child was placed by [agency or person] (adoption element #34)

CWS/CMS does not have the capability to collect child support information. This is a required data element for AFCARS data reporting. Completing an interface is an action item identified in the State's Statewide Child Welfare Information System (SACWIS) Assessment. Whether or not the interface is complete, the State must develop a method to collect and report if child support payments are paid on behalf of the child during each AFCARS report period. The collection and reporting of AFCARS data is required regardless of whether a State has a SACWIS. The development of SACWIS is optional for States. If a State does develop a SACWIS it must, at the time of becoming operational, be able to collect and report all of the AFCARS data. Otherwise, the State is out of compliance with the SACWIS Federal regulations.

AFCARS asks for who or what agency placed the child for adoption - the public agency, a private agency, a tribal agency, an independent person, or the birth parent. The State is incorrectly reporting this information. The program code only extracts the response "public agency." This is incorrect because the State is also involved in non-State agency adoptions. The State enters into adoption agreements with families adopting children from private agencies where the child was determined to have special needs. These records should indicate "placed by private agency" in the AFCARS report.

- Information on record numbers (foster care element #4 and adoption element #3)

For AFCARS reporting, each record has a number that must be either a sequential number or a unique, encrypted number. California submits an encrypted record number. These record numbers are to be used for a child for as long as he/she is in foster care, and regardless of where the child is placed within the state. Should a child exit foster care and re-enter in either the same or a different county the same record number should be given to the child. The State indicated to the AFCARS team that a number is assigned to the child the first time he/she receives any service and this number is used Statewide and remains the child's number.

ACF noted that the same record number appears in different submissions and may have different demographic information. The State staff indicated this may be due to the client merge

functionality (i.e., merging the records when a client has been entered twice). Based on the State and ACF's analyses this element needs to be further investigated and corrections made.

- Information on Children Diagnosed with Disabilities (foster care elements #10 - 15; adoption elements #11 - 15, if the primary basis for special needs is a medical/emotional condition)

The State staff indicated that this information is underreported for the foster care file. For the report period under review, the number of responses for "yes" were 45,610 (36%), 78,734 (62%) for "no," and 2,859 (2%) for "not yet determined."

In the foster care file, AFCARS contains the question "Has the child been clinically diagnosed as having a disability(ies)?" The State's CMS/CWS system does not have this question. Instead, the case worker selects the child's diagnosed conditions. The response to the question on diagnosed disabilities is derived from these fields. So, if a disability is checked, the response to the question is "yes." Otherwise, the response is coded as "no," possibly creating a false "no" in the reported data. A blank in any of the fields could mean the child has not been seen by a physician, that the worker has not received the doctor's report, or the child had been seen by a doctor and has no medical needs. The responses in AFCARS have specific definitions:

"Yes" indicates that a qualified professional has clinically diagnosed the child as having at least one of the disabilities listed below.

"No" indicates that a qualified professional has conducted a clinical assessment of the child and has determined that the child has no disabilities.

"Not Yet Determined" indicates that a clinical assessment of the child by a qualified professional has not been conducted.

Included in Tab A is a list of the State's mapping of diagnosed conditions and ACF's notes as to whether the condition should be mapped, or if mapped incorrectly, what it should be mapped to instead.

- Information on race and Hispanic/Latino origin (foster care elements #8 - 9, #52 - 55, adoption elements #7 -8, and #25 - 28)

One of the significant issues with the collection of this information is that the case worker can select "Hispanic" as a primary "ethnicity" (race) and not select a secondary "ethnicity" (race). (The State refers to the race field as "ethnicity.") Also, missing data is mapped to "unable to determine." Therefore, if a case worker enters the information only on Hispanic/Latino there will be no race information reported on the individual. Case workers must ask individuals to self-identify with one or more of the races and whether they are of Hispanic/Latino origin.

- Information related to foster parents (foster care elements #49 and #50 – 55)

An error was found in the program code. Foster parent information is being mapped to the "caretaker" (the people from whom the child was removed) elements.

The case file review findings indicate a significant amount of data missing for foster parents. This included race, Hispanic/Latino origin, and dates of birth. These were all cases in which the child was living in a foster home and this information is required. In general, the reviewers often did find the information in the paper case file. The State needs to ensure that this data is entered in a timely manner. In the situation of children placed with private child placing agencies under contract to the State/county, these agencies must provide the information on the foster parents.

- Relationship of child to adoptive parents (adoption elements #29 – 32)

In the adoption file, the State is to report the relationship of the child to the adoptive parent(s). AFCARS allows for the reporting of more than one relationship. The State collects this data but it may be underreported in regard to multiple relationships. The system allows the worker to select only one relationship (step-parent, foster parent, other relative or other non-relative) of the adoptive parent to the child. For instance, if the adoptive parent was a relative and had been a foster parent, only one of the relationships is reported in AFCARS. This is resulting in an under-representation of the number of relatives and foster parents that are adopting children in California.

CONCLUSION

The State has several “technical” corrections to make to the program code and the screens that collect the data. Once changes are made to the program code and/or to the data entry screens, the quality of the data will need to be monitored for accuracy. It may be necessary to implement additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider system ticklers/edits that will remind workers to update the information at appropriate times, and review the data in the file at the time of a periodic review. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff are to submit the Improvement Plan to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. The State and the ACF Regional Office (in conjunction with the Children’s Bureau) will discuss the completion dates outlined by the State and negotiate the final due dates. The State should provide written quarterly updates of its progress to the Regional Office. Additionally, the State’s plan for implementing the changes to the system and for caseworker training must be included in the State’s title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The State should contact the ACF Regional Office once it has completed the changes to the system. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the

data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.